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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

KARIN BAUER, ANGELA STURGES, and  
CHRISTIE SHINN, individually and on behalf of  
all others similarly situated,

Plaintiffs,

v.

PAYPAL, INC. and PAYPAL HOLDINGS,  
INC.,

Defendants.

**CASE NO.: 5:25-cv-00580**

**PLAINTIFFS BAUER, STURGES, AND  
SHINN'S RESPONSE TO JOINT  
MOTION TO CONSOLIDATE CASES**

On January 22, 2025, the plaintiffs in *Silva v. PayPal*, No. 5:24-cv-09510-BLF (N.D. Cal.), *GamersNexus LLC v. PayPal Holdings, Inc., et al.*, No. 5:25-cv-00114-BLF (N.D. Cal.), *Young v. Paypal Inc., et al.*, No. 5:25-cv-00124-BLF (N.D. Cal.), *Coleman v. PayPal Inc. et al.*, No. 5:25-cv-00367-BLF (N.D. Cal.), *Moran v. PayPal, Inc., et al.*, No. 5:25-cv-00476-BLF (N.D. Cal.), *Lyon Fitness v. PayPal, Inc., et al.*, No. 5:25-cv-00501-BLF (N.D. Cal.), *Oganesyan et al. v. PayPal, Inc., et al.*, No. 4:25-cv-00518-BLF (N.D. Cal.), *Brevard Marketing v. PayPal, Inc., et al.*, No. 5:25-cv-00573-BLF (N.D. Cal.), and *Wendover Productions, LLC, et al. v. PayPal Inc.*, No. 5:24-cv09470-BLF (N.D. Cal.) filed an unopposed Joint Motion for Consolidation of Actions and to Set the Process for Appointment of Interim Class Counsel ("Joint Motion"). ECF 38.

1 Plaintiffs Karin Bauer, Angela Sturges, and Christie Shinn (“Plaintiffs”) file this response  
2 in support of the Joint Motion, and respectfully request that the Court grant the Joint Motion and  
3 enter an order: (1) consolidating the Related Actions, and any future related actions filed in,  
4 removed to, or transferred to this Court, pursuant to Fed. R. Civ. P. 42(a) under the docket of the  
5 first-filed *Wendover* action; (2) recaptioning the action to *In re PayPal Honey Browser Extension*  
6 *Litigation*; and (3) setting a schedule for counsel to file motions to appoint interim class counsel.  
7 Plaintiffs agree that consolidation and appointment of interim class counsel is appropriate.

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1 Date: January 27, 2025

Respectfully submitted,

2 **LEVI & KORSINSKY LLP**

3 By: /s/ Adam M. Apton

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17 *\*pro hac vice forthcoming*